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November 8, 2024

VIA E-MAIL

Hon. Timothy M. Reif United States Court of International Trade 1 Federal Plaza New York, New York 10278

Re: Baker v. MTA Bus Company, et al., Case No. 18-cv-12231

Dear Judge Reif:

We write on behalf of Defendants in the above-captioned action. Pursuant to Federal Rule of Civil Procedure 5.2(d), Rule 5.B of Your Honor's Individual Rules of Practice and Rules 6 and 21 of the Southern District of New York's ECF Rules & Instructions, Defendants respectfully request—and join in Plaintiff's prior request for the same (Dkt. No. 128)—that their response to Plaintiff's submission outlining his requested and estimated damages (Dkt. No. 130) be filed with redactions and that the attachment to their submission identified as Exhibit 1 be filed under seal.

Defendants request to file a redacted version of their submission and to file their one attachment under seal for the reasons set forth in Plaintiff's letter seeking the same: namely, that the redacted portions of Defendants' submission and Exhibit 1 contain Plaintiff's sensitive personal information and employment history, which are specifically identified as categories of personal sensitive information that litigants redact and file under seal without prior Court approval pursuant to Rule 5.B and ECF Rule 21.4. The parties' interest in redacting and filing this information under seal is not outweighed by any public interest in Plaintiff's employment or pay history. This request is also consistent with previously-granted requests to redact and file under seal, including Plaintiff's request for the same (*See* Dkt. Nos. 90, 96, 128).

GRANTED. The court grants defendants' motion to file a redacted

version of their submission and to file Exhibit 1 under seal. The Clerk of the Court is directed respectfully to close the open motion at ECF No. 131.

Respectfully submitted,

SO ORDERED

DATE November 14, 2024

Connor G. Shea

TIMOTHY M. REIF, JUDGE, UNITED STATES COURT OF INTERNATIONAL TRADE SITTING BY DESIGNATION UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

cc: Counsel of Record (Via E-Mail)